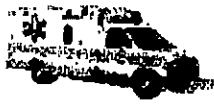


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Ashley Medical Transport Service, Inc.

Post Office Box 742
940 Stevenson Road
Abbeville, SC 29620



864-446-8003
Toll Free: 800-524-4251
Fax: 864-446-8006
Billing: 864-446-8009

COPY

October 27, 2008

Public Service Commission
101 Executive Center Drive
Columbia, SC 29210

Members of the Public Service Commission:

Posted: 10/27/08
Dept: AA / PRS
Date: 10/30/08
Time: 1:00

This letter is to state my concerns regarding the above docket number 2007-445-A. I disagree with the possible decision to allow "Stretcher Vans" in South Carolina. First of all, I disagree with the proposal to allow non certified personnel to transport patients via stretcher. Persons requiring stretcher transportation clearly have numerous medical problems and are unable to even sit in a wheelchair. Due to the medical conditions of these patients, there is a necessity for continuous medical monitoring. These are patients who receive continuous medical care in the nursing home, assisted living homes, or at home taken care of by home health nurses. These patients should receive medical care at least from an EMT - Basic, not someone certified only in first aid. A great majority of these patients are residents at a nursing home because their condition demanded constant medical monitoring. Yet, there is a possibility that they may be transported by a stretcher van without personnel trained to handle an emergent situation, which can happen at any time with these patients. For those patients who do not require transportation by an ambulance, there is wheelchair van transportation, which is less costly. However, there is only one attendant who is certified in First Aid and CPR, but there is no medical equipment onboard except for a First Aid kit. This is essentially what a stretcher van would be; the only difference is it would accommodate a stretcher and one more first aid certified attendant. How will these persons be trained to recognize the vast variety of emergent situations that could arise at any time? It states in the proposed regulation that "stretcher van shall not be used to transport a person who needs or may need oxygen unless that person physician has prescribed oxygen as a self-administered therapy", what about the patients who require continuous oxygen and they have dementia and are not in a state of mind to administer their own or are too weak and frail to administer their own oxygen. It also states that "all storage compartments, supplies and equipment shall be kept clean and sanitary", it is misleading as to what supplies and equipment this is referring to since there is no medical equipment or supplies on the van. In the proposed regulation it also states that "a stretcher van shall not contain medical equipment or supplies or display any marking, symbols or warning devices that imply that it offers medical care or ambulance transportation", so why would this mode transport be required for patients who require obvious medical monitoring. The EMS System was created to provide medical care and save lives. My concern is that patients that require stretcher are not going to receive the medical care that they have a right to and obviously deserve and their lives will be put at risk. I have owned and operated Ashley Medical Transport Service since 1991; I saw that there was an enormous need for Nonemergency transportation. My service provides emergency and nonemergency ambulance transportation, as well as wheelchair van transportation. I have been an Paramedic for 18 years and was an EMT for 11 years prior to that and I have seen many changes in the EMS field. Most of these changes have been for the better, until recent times. Now, there are changes being made to save money and that's all good but not when it means sacrificing the welfare and safety of another human being, who puts their lives in our hands. Thank you in advance for considering my thoughts on this issue.

Thanks,

Ronnie Ashley
Ashley Medical Transport Service, Inc.

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OCT 30 2008

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